

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division

UNITED STATES OF AMERICA	)	<u>UNDER SEAL</u>
	)	
v.	)	CRIMINAL NO. 2:03cr
	)	
JULIA DEL GUZZO	)	8 U.S.C. § 1324(a)(1)(A)(iii)
a/k/a Julia Radwaniecka,	)	Harboring Unauthorized Aliens
	)	(Count 1)
Defendant.	)	
	)	18 U.S.C. §§ 1956(a)(1)(A)(i)
	)	and 2
	)	Money Laundering
	)	(Counts 2-7)

INDICTMENT

\_\_\_\_\_ March 2003 Term - at Norfolk, Virginia

COUNT ONE

THE GRAND JURY CHARGES THAT:

**Introduction**

At all times material to this Indictment:

1. Laws and regulations of the United States provided that foreign nationals could be granted status as non-immigrant visitors so they could temporarily visit the United States.

2. Non-immigrant foreign national visitors could be issued "tourist" or "visitor" visas by the United States Department of State to facilitate their temporary visits to the United States.

3. Upon arrival in the United States, immigration officials at ports of entry established the length of time that non-immigrant visitors were authorized to remain in the United States.

4. Laws and regulations of the United States required that each non-immigrant visitor had to agree to depart the United States

at the expiration of his or her authorized period of admission in order to achieve status as a lawful visitor in the United States.

5. Laws and regulations of the United States, including Title 8, United States Code, Section 1324(a)(1)(A), prohibited non-immigrant visitors from engaging in any employment during their temporary visits to the United States.

6. Laws and regulations of the United States further established that any unauthorized employment by a non-immigrant visitor constituted his or her failure to maintain status as a lawful visitor to the United States. A foreign national who is employed in the United States while here on a non-immigrant visitor visa and is otherwise not authorized to be so employed is an "unauthorized alien." Title 8, United States Code, Section 1324a(h)(3).

7. Laws and regulations of the United States, including Title 8, United States Code, Section 1227(a)(1)(C), rendered as deportable any non-immigrant visitor who failed to maintain the status in which he or she was admitted to the United States.

8. Laws and regulations of the United States, including Title 8, United States Code, Section 1227(a)(1)(B), rendered as deportable any non-immigrant visitor who was present in the United States in violation of federal immigration laws.

9. W & G Services was a Florida Corporation engaged in the business of supplying temporary contract workers to hotels, landscapers, and other labor intensive industries in the Eastern District of Virgin and elsewhere. W & G Services established a bank account with South Trust Bank in Florida. The defendant was employed as a supervisor with W & G Services until on or about April 5, 2002.

10. Millennium Services, an entity established by the defendant on or about April 5, 2002, was likewise engaged in the business of supplying temporary contract workers to hotels, landscapers and other labor intensive industries in the Eastern District of Virginia and elsewhere. Upon establishing Millennium Services, the defendant opened a bank account in the name of Millennium Services at Bank of America in Florida.

11. Payments made by clients of W & G Services and Millennium Services for the provision of temporary contract workers were made to these entities' respective bank accounts at SunTrust Bank and Bank of America. Thereafter payments to the unauthorized alien workers employed and supplied by W & G Services and Millennium Services were made from these entities' respective bank accounts at SunTrust Bank and Bank of America. No federal withholdings were deducted from the pay of the unauthorized alien workers employed by W & G Services, and Millennium Services.

12. Bank of America and South Trust Bank were financial

institutions whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC).

**Harboring of Unauthorized Alien**

From on or about January 12, 2001, and continuously thereafter up to and including the filing of this indictment, within the Eastern District of Virginia and elsewhere, the defendant JULIA DEL GUZZO, also known as Julia Radwaniecka, did knowingly and in reckless disregard of the fact that aliens had come to, entered, and remained in the United States in violation of law, concealed, harbored and shielded from detection, and attempted to conceal, harbor or shield from detection such aliens, both known and unknown to the Grand Jury, in any place, including any building and any means of transportation.

(In violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii) and Title 18, United States Code, Section 2.)

COUNTS TWO THROUGH SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations set forth in Count One are hereby realleged and incorporated herein as if set forth in full.

2. On or about each of the dates set forth below, in the Eastern District of Virginia, defendant, JULIA DEL GUZZO, also known as Julia Radwaniecka, did unlawfully and knowingly conduct and attempt to conduct, and cause to be conducted, the following transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, the harboring of unauthorized aliens, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii), with intent to promote the carrying on of the specified unlawful activity:

COUNT	DATE	TRANSACTION DESCRIPTION	PAYOR/BANK LOCATION	AMOUNT
2	4/26/02	Deposit of check number 072813 to Millennium Services account 0034 4727 0555 Bank of America, N.A.	Kempsville Building Materials, Inc. Virginia Beach, VA Account 769134 Bank of America	\$7,053.75
3	5/02/02	Deposit of check number 072936 to Millennium Services account 0034 4727 0555 Bank of America, N.A.	Kempsville Building Materials, Inc. Virginia Beach, VA Account 769134 Bank of America	\$8,407.50
4	5/22/02	Deposit of check number 20482 to Millennium Service account 0034 4727 0555 Bank of America, N.A.	DFI Systems Inc. Hampton, Virginia Account 1841475838 Wachovia Bank, N.A.	\$6,628.63
5	6/06/02	Deposit of check number 21984 to Millennium Service account 0034 4727 0555 Bank of America, N.A.	B.T.T.W. T/A Taylor Rental Norfolk, Virginia Account 5131685361 Branch Banking and Trust Company of Virginia	\$19,637.19
6	6/13/02	Deposit of check number 12551 to Millennium Services account 0034 4727 0555 Bank of America, N.A.	Garlin Hotels Corporation Norfolk Airport Hilton Norfolk, VA Account 5132166309 Branch Banking and Trust Company of Virginia	\$8,411.25
7	6/27/02	Deposit of check number 21425 to Millennium Services account 0034 4727 0555 Bank of America, N.A.	B.T.T.W. T/A Taylor Rental Norfolk, Virginia Account 5131685361 Branch Banking and Trust Company of Virginia	\$8,825.49

(All in violation of Title 18, United States Code, Sections  
1956(a) (1) (A) (i) and 2).

CRIMINAL FORFEITURE

A. The defendant, if convicted of the violation in Count One, Title 8, United States Code, Section 1324, as part of the sentencing in this case pursuant to Fed. R. Crim. P. 32.2, shall forfeit to the United States:

1. Any property, real or personal, which constitutes or is derived from proceeds traceable to a violation enumerated as a "specified unlawful activity as defined in section 18 U.S.C. 1956(c)(7), which includes those offenses listed in section 18 U.S.C. 1961.

(In violation of 18 U.S.C. 981(a)(1)(C) pursuant to 28 U.S.C. 2461(c)).

B. The defendant, if convicted of the violations in Counts Two through Seven, Title 18 United States Code, Section 1956(a)(1)(A)(i), as part of the sentencing in this case pursuant to Fed. R. Crim. P. 32.2, shall forfeit to the United States:

1. Any property, real or personal, involved in a such offense, or any property traceable to such property.

(All in violation of 18 U.S.C. 982(a)(1)).

C. If any of the property described as being subject to forfeiture, as a result of any act or omission of the defendant -

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred to, sold to, or deposited with a

third party;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property that cannot be subdivided without difficulty; it is the intent of the United States to seek forfeiture of any other property of defendants up to the value of the property described above, as being subject to forfeiture pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

PAUL J. MCNULTY  
UNITED STATES ATTORNEY

By: \_\_\_\_\_  
Stephen W. Haynie  
Assistant United States Attorney